

Jim



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8, MONTANA OFFICE  
FEDERAL BUILDING, 301 S. PARK, DRAWER 10096  
HELENA, MONTANA 59626-0096

January 25, 2002

David M. Smith  
Manager Environmental Remediation  
Burlington Northern Santa Fe Railway  
8200 East Park Meadows Drive, Suite 8204  
Lone Tree, CO 80124

Dear Mr. Smith: *Dave*

The *Draft Petition for Controlled Groundwater Use Area at the BNSF Somers Site, Somers, Montana* has been received and reviewed by EPA and the Montana Department of Environmental Quality (DEQ). Several minor revisions will be required prior to providing a draft to the Flathead City-County Health Department for their review. The revisions were discussed during our telephone conversation last week.

The primary focus of the EPA's and DEQ's comments is the boundary of the area proposed for groundwater controls and the characterization of the dissolved contaminant plume. The comments concerning the area boundary are as follows:

1. The yellow shaded areas on Figures 6 and 7 should be revised so that the source area (yellow) is continuous from the CERCLA Lagoon to well S-88-3. The dissolved plume is not discontinuous between S-88-2 and S-88-3 as indicated in the current Figures.
2. The boundary of the proposed area should be continuous and include Somers Road. As drawn, there are two areas.
3. The boundary on the north side of the area should be moved to the fence north of the former RCRA impoundments. The area should be minimized where possible.
4. The area boundary in the North Homesites Area should be moved to provide a larger buffer between the estimated dissolved plume and the area of control. This is necessary because the boundary of the dissolved plume in that area is not clearly defined. The boundary should connect the northeast boundary near S-6 at Somers Road to the boundary parallel with contour 2888 at the first corner on the east end.



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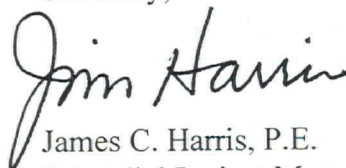
There are several additional comments that should be addressed in the revised draft:

1. Please add the 1992 ESD to the list of supporting documents.
2. References to cleanup levels and the TI Evaluation should reflect discussions concerning ARARs and risk-based criteria.
3. Page 8 - Section 6, sentence 4, Please change "acceptable conditions" to "appropriate standards".
4. Figures - Please add the infiltration trench to each figure where appropriate.

Unless there is additional discussion required as the result of these comments, a final draft version of the petition can be prepared and distributed to the agencies and the Flathead City-County Health Department with the appendices. We can determine if discussion with the Health Department is needed once they review the draft.

Thanks for your continued cooperation with the petition process. Please let me know if you have any questions concerning this review.

Sincerely,



James C. Harris, P.E.  
Remedial Project Manager

*Sent*  
cc: L. DeWitt, DEQ  
M. Bell, Weston  
L. Carlson, Retec, Billings